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**From:** McGrath, Patricia [mcgrath.patricia@epa.gov]  
**Sent:** 2/24/2020 4:00:16 PM  
**To:** Vaughan, Molly [Vaughan.Molly@epa.gov]; Hough, Palmer [Hough.Palmer@epa.gov]; LaCroix, Matthew [LaCroix.Matthew@epa.gov]  
**Subject:** RE: Pebble Jan 2020 draft Compensatory Mitigation Plan

I will just add that it is not unusual for us to provide NEPA comments on EIS reference documents, particularly when an EIS relies heavily on the reference document. This is especially relevant for mining projects where there is complicated modeling or analysis in the reference documents upon which the EIS conclusions are based.

Patty

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**From:** Vaughan, Molly <Vaughan.Molly@epa.gov>  
**Sent:** Friday, February 21, 2020 11:12 AM  
**To:** Hough, Palmer <Hough.Palmer@epa.gov>; McGrath, Patricia <mcgrath.patricia@epa.gov>; LaCroix, Matthew <LaCroix.Matthew@epa.gov>  
**Subject:** RE: Pebble Jan 2020 draft Compensatory Mitigation Plan

Hi Palmer,

As far as I know, cooperating agencies have not been specifically asked to review the CMP, and you are correct that it wasn't distributed with the PFEIS package. However, it is directly referenced in Section 5.3 Avoidance, Minimization and Compensatory Mitigation under the Clean Water Act – see pg 5-43: "PLP has prepared a draft Compensatory Mitigation Plan (CMP) (PLP 2020-RFI 056a) outlining their proposed approach for compensatory mitigation to offset environmental losses resulting from unavoidable impacts to aquatic resources (see Appendix M, Section M2.0)."

So, to the extent that we have NEPA-relevant comments on the RFI, I do think it would be reasonable to provide those with our Pre-FEIS comments.

--Molly

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**From:** Hough, Palmer <Hough.Palmer@epa.gov>  
**Sent:** Thursday, February 20, 2020 11:46 AM  
**To:** McGrath, Patricia <mcgrath.patricia@epa.gov>; Vaughan, Molly <Vaughan.Molly@epa.gov>; LaCroix, Matthew <LaCroix.Matthew@epa.gov>  
**Subject:** Pebble Jan 2020 draft Compensatory Mitigation Plan

Folks

Is the Jan 2020 CMP a part of the package that cooperating agencies were asked to review with the PFEIS? I don't see it attached as part of Appendix M as it was in the DEIS and I did not see it among the other files that Molly downloaded to the sharepoint folder, or am I missing something?

Thanks, Palmer

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